

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :  
: Plaintiff, :  
v. : : Criminal Action No. 06-82-SLR  
: :  
DUVILLE GOULD, :  
: Defendant. :  
:

**DEFENDANT'S MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS**

Defendant Duville Gould, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court pursuant to Federal Rule of Criminal Procedure 45(b) and Local Rule 5(a) for an order enlarging the time within which pretrial motions may be filed. In support of this motion the Defendant submits as follows:

1. Pre-trial motions for this case are due by October 20, 2006.
2. Defense counsel requires additional time to sufficiently review the discovery in the present case and additional time to meet with Mr. Gould to discuss how the defense is going to proceed, before it can be determined what, if any, pre-trial motions need to be filed. In addition, as of the filing of this motion, there is discovery still outstanding that defense counsel also needs to review in making a determination as to whether or not to file pre-trial motions. It is respectfully requested that an extension of time of one month be granted in which to file any pre-trial motions.
3. AUSA Richard Andrews, counsel for the government, does not oppose the defense's request for an extension of time in which to file pre-trial motions.

4. Mr. Gould has no objection to the extension of time.
5. The defense agrees to waive, pursuant to the Speedy Trial Act, any additional time given in which to file pre-trial motions.

WHEREFORE, it is respectfully requested that the time for Defendant to file pre-trial motions be extended until November 20, 2006.

Respectfully Submitted,

/s/ Eleni Kousoulis  
Eleni Kousoulis, Esquire  
Acting Federal Public Defender  
First Federal Plaza  
704 King Street, Suite 110  
Wilmington, Delaware 19801  
Attorney for Defendant Duville Gould

Dated: October 20, 2006

**CERTIFICATE OF SERVICE**

Undersigned counsel certifies that a copy of Defendant's Motion to Extend Time to File Pretrial Motions is available for public viewing and downloading and was electronically delivered on October 20, 2006.

Richard Andrews, Esq.  
Assistant U.S. Attorney  
1007 Orange Street  
Suite 700, P.O. Box 2046  
Wilmington, DE 19899-2046

/s/ Eleni Kousoulis

Eleni Kousoulis, Esquire  
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(302) 573-6010

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	:	
Defendant.	:	

## ORDER

Having considered Defendant's Motion to Extend Time to File Pretrial Motions,

**IT IS HEREBY ORDERED** this \_\_\_\_\_ day of \_\_\_\_\_, 2006, that Defendant Gould's pretrial motions shall be due on the \_\_\_\_\_ day of \_\_\_\_\_, 2006.

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Honorable Sue L. Robinson  
United States District Court